

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JUAN RAYMOND PEREZ,
Petitioner,

V.

ALBERTO GONZALES, Attorney General;
MICHAEL CHERTOFF, Secretary,
DEPARTMENT OF HOMELAND SECURITY;
and MICHAEL J. GARCIA, Acting Secretary,
BRUCE CHADBOURNE,
Interim Field Office Director,
Boston District, BUREAU OF IMMIGRATION
AND CUSTOMS ENFORCEMENT;

Respondents

NO. 05-10895-DPW

**ASSENTED-TO MOTION FOR 14 DAY PERIOD TO RESPOND TO RESPONDENTS'
MOTION TO TRANSFER CASE TO FIRST CIRCUIT COURT OF APPEALS**

Now comes the Petitioner, Juan Raymond Perez, through counsel, and hereby requests a 14 day period, through June 15, 2005, in which to submit a response to the Respondents' "Motion to Transfer Case to First Circuit Court of Appeals Pursuant To Section 106(c) of the Real ID Act of 2005."

Respondents' motion is based upon the May 11, 2005 enactment of section 106(c) of the REAL ID Act of 2005, Pub. L. No. 109-13, Div. B, 119 Stat. 231 ("RIDA"). This statute purports to eliminate the district court's habeas jurisdiction to review final orders of removal pursuant to 28 U.S.C. §2241, and provides for transfer of cases pending in the district court to the United States Court of Appeals for the First Circuit.

Mr. Perez respectfully requests a 14 day period in which to submit a response to the Respondents' motion. Petitioner's counsel is a sole practitioner and will require this period in order to effectively review the new provisions of the REAL ID Act which are presently at issue in this case. Undersigned counsel has conferred with Respondents' counsel, who has no objection to this request.

WHEREFORE, Petitioner moves this Honorable Court for leave to submit a response to the Respondents' motion to transfer, through June 15, 2005.

Respectfully Submitted,
Juan Raymond Perez,
By His Attorney,



Randy Olen, Esq.
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CERTIFICATION

I hereby certify that on the 2nd day of May, 2005, I sent a true copy of the within **Motion** via first class mail to Anton P. Giedt, Assistant U.S. Attorney, United States Attorney's Office, John Joseph Moakley Courthouse, One Courthouse Way, Boston, MA 02210.


